



DIVISION OF  
ENFORCEMENT

UNITED STATES  
**SECURITIES AND EXCHANGE COMMISSION**  
100 PEARL STREET, SUITE 20-100  
NEW YORK, NY 10004-2616

September 12, 2022

**By ECF**

Hon. Kenneth M. Karas  
United States District Court  
United States Courthouse  
300 Quarropas Street, Chambers 533  
White Plains, New York 10601-4150

Re: *U.S. Securities and Exchange Commission v. Bronson et al.*,  
12-CV-6421 (KMK)

Dear Judge Karas:

I write on behalf of the Securities and Exchange Commission (“SEC”) to clarify whether the Court will be holding an evidentiary hearing on September 20, 2022. If so, the SEC requests that the Court order the requested witnesses - Dawn Kellas, John Kellas, Paul Rachmuth, Bruce Bent, and Ryan Stumphauzer - to appear. Alternatively, the SEC stands ready to issue subpoenas requiring them to appear.

The SEC also seeks guidance on whether it should arrange to have Mr. Bronson appear in Court on September 20, 2022, or whether the Court will direct the U.S. Marshals Service to secure his presence at the hearing.

Respectfully submitted,  
*s/ Maureen Peyton King*